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Marlene H. Dorch
Office of the Secretary
Federal Communications Commission
445 12th St. SW
Washington, DC 20554

Compliance Letter
Re: WC Docket No. 05-196

To whom it may concern,

This letter is a response to the *VoIP 911 Order* referenced in WC Docket No. 05-196. As an interconnected VoIP carrier, BestWeb Corporation serves the New York Metropolitan and Lower Hudson Valley areas of New York State, or LATAs 132 and 133. This shall certify that BestWeb is 100% in compliance with the rules established in the aforementioned *Order*. BestWeb's 911 service is being provided by Telefinity Dash911.

The Solution

The V911™ solution enabled by Telefinity Dash911 through Intrado provides a true E911 solution for VoIP Service Providers. The solution provided by the Telefinity Dash911 affiliation with Intrado enables a comprehensive approach to delivering E911 for VoIP by handling all aspects of the VoIP 911 call delivery and VoIP Positioning Center (VPC) functionality such as Master Street Address Guide (MSAG) Address Validation, ESQK management, Geocoding, real-time provisioning and routing determination. Included in the Service for the VSP is also the call delivery component to ensure the 911 call reaches the appropriate selective router and Public Safety Answering Point (PSAP). Specifically, Intrado manages the VPC functionality and the Call Delivery component on behalf of Telefinity Dash 911 thereby enabling VSPs to take advantage of a full end-to-end solution from one E911 service provider.

The only VSP requirements for delivery of the V911 service are the ongoing delivery of address and telephone number information to Telefinity Dash911 via a real-time interface and the PSTN connectivity to the Telefinity Dash911 network to enable live 911 call delivery. The real-time interface is via a SOAP API programming interface supplied by Telefinity Dash 911 to its VSP customers, or, a branded website interface provided by Telefinity Dash911 to its VSP customers.

911 Routing Information/Connectivity to Wireline E911 Network

As specified in Paragraph 42 of the *VoIP 911 Order*, BestWeb is transmitting all 911 calls to the appropriate PSAP, designated statewide default answering point, or appropriate local emergency authority utilizing the Selective Router, the trunk line(s) between the Selective Router and the PSAP, and such other elements of the Wireline E911 Network as are necessary in those areas where Selective Routers are utilized

The attached "Major Market Deployment Map" and the "VoIP Deployment Plan" reflect the major market deployment schedules of BestWeb's 911 provider. It should be noted that the areas that BestWeb serves are in 100% compliance.

Note: the market deployment map represents major markets where Intrado has reported to Telefinity Dash911 that it has connectivity to at least 1 selective router, ALI steering and the ability to populate ALI.

Transmission of ANI and Registered Location Information

BestWeb is transmitting via the Wireline E911 Network the 911 caller's ANI and Registered Location to all answering points that are capable of receiving and processing this information. All of the answering points within the BestWeb's service area are capable of receiving and processing ANI and Registered Location information that it transmits and all subscribers ANI and registered location are being transmitted to the correct answering points. Telefinity Dash911 has indicated that Intrado has noted that there are currently four (4) States and a Territory that will have native Selective Routing functionality but will only provide Automatic Number Identification (ANI) only service to the PSAP. BestWeb has no subscribers in this area and is unaffected.

911 Coverage

The Telefinity Dash 911 E911 solution uses Intrado as a backbone supplier and as such Intrado is the VPC and is working on nationwide native VoIP E911 delivery in accordance with the Commission Order. The initial PSAP deployments are targeted in major metropolitan areas throughout the US based on the VSP customer subscriber base priorities. The attached "*Major Market Deployment Map*", which corresponds with MSAs, identifies regions within our subscriber territory that have connectivity to at least one Selective Router, ALI steering capabilities; ANI and the ability to populate ALI. Telefinity Dash 911 has advised us that these areas are planned for deployments by November 28, 2005; March 31, 2006 and June 30, 2006. This intention of this map is to demonstrate FCC compliance for the November 28th requirements based on BestWeb's coverage area.

Telefinity Dash 911, provides BestWeb at least one way of registering and updating each subscriber's Registered Location. As a component of the Telefinity Dash911 Service we have access to a near real-time address update system provided to us by Telefinity Dash911. This allows us to have near real-time delivery of the subscriber's address and also allows us as a VSP to submit a subscriber's address update information directly. The system allows us to have the subscriber input his/her initial address into the system at the time of initially signing up for our VoIP service. Addresses submitted are subjected to an immediate screening against the US Postal Service Street Address Guide in order to immediately determine if the submitted address is a valid address.

Subscribers have more than one option to input, update or change their address. Subscribers can easily and quickly update their Registered Location by either (a) online via our website, or (b) use the Telefinity Dash911 telephone touch tone (IVR) system to either select another pre-registered address that the subscriber may already have on file, or to ask for an operator who will make the address change while the customer is on the phone.

At the time of an emergency VoIP 911 call, Telefinity Dash 911 passes the call directly to Intrado's call routing system. Intrado's call routing system uses the customer's provisioned information to associate the latitude and longitude assigned during provisioning with the wireline PSAP boundaries maintained by Intrado to determine appropriate PSAP for delivery of the MSAG Valid Address and Call Back Number of the user.

Telefinity Dash 911 also offers to us, as a VSP a newly-released product called "Level of Service (LoS) Query" that we can choose to integrate into our application. This functionality enables us to make a real-time query with an address of a customer/end user for the purpose of determining the level of 911 service available to that customer based on their location. Intrado will return a set of responses (Enhanced, Basic, etc.) that will enable us or our user to determine the level of 911 service available at that address and take appropriate action.

Technical Solution for Nomadic Subscribers:

As a VSP using Telefinity Dash911's E911 for VoIP service, we are able to route VoIP emergency calls from our VoIP network to Telefinity Dash 911's Intrado Network or alternative 3rd party network for delivery to the appropriate Selective Router and then on to the geographically appropriate Public Safety Answering Point (PSAP) via the native 911 infrastructure. The Services utilized provide a "native" 911 solution for routing VoIP 911 calls from both in-region and out-of-region telephone numbers (TNs) to the most geographically appropriate PSAP. The V911 solution enables full support of nomadic usage of VoIP provided the user updates their address information upon connecting to the Internet at a new location/address. Through the Telefinity Dash 911 interface, the 911 solution will enable the near real-time provisioning (Geocoding and MSAG Validation) of the newly-provisioned address and make available (assuming no errors) that particular user's information for delivery to the PSAP within an average of 15 minutes of receipt of the new Registered Location address information.

We recognize the universal desire to remove the user interaction and self-provisioning component of the current 911 solution. To that end, we understand that Telefinity Dash 911, along with Intrado, are actively working a number of "location determination" technologies.